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September 8, 2006

**VIA ELECTRONIC MAIL**

Ms. Gaylee Adell  
Mr. Jim Howard  
Mr. Chris Poschl  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

**RE: Consumer Protection and Safety Division's Workshops on Cramming Reporting Requirements—Verizon California Inc.'s Comments**

Dear Ms. Adell and Messrs. Howard and Poschl:

On August 11, 2006 Staff released a Cramming Reporting Requirement discussion paper. Staff held a follow-up workshop on August 21, 2006 to discuss reporting proposals. Staff's proposal indicated that after the second workshop, and after this round of comments, Staff would propose cramming-related reporting requirements in a final workshop report, consistent with the directives of D.06-03-013.

Staff proposes that those subject to cramming reporting requirements provide reports on the following "complaints."

1. Customer complaints seeking to remove or reduce unauthorized charges. This applies to communications and non-communications charges, and recurring and non-recurring charges that appear on consumer's telephone bill placed on it by the carrier and/or a third party such as a billing agent.
2. The unauthorized addition of services or features to a consumer's telephone service that a consumer allegedly never ordered, authorized or received. These services may be such things as voice mail, caller ID, special service packages or fee-for-service charges such as 900 calls. Sometimes an unauthorized one-time charge for entertainment services will be placed onto a consumer's phone bill.
3. If a customer terminated a particular service but was still charged for the terminated service.
4. Unauthorized monthly recurring charges placed onto a consumer's phone bill.

5. Situations where a consumer authorized a service, but was misled about the true cost.
6. Situations involving false or deceptive charges. In such situations, the issue often becomes the level of clear disclosure to the consumer of the charge.
7. Charges that are initiated in fine print on the back of contests or sweepstakes entry forms.

Staff's proposal clarifies that the following are not reportable complaints:

1. Complaints about charges deemed authorized should not be reported (e.g., direct dialed calls and government mandated fees and surcharges).
2. Charges incurred through a stolen or lost phone: Staff does not consider complaints over charges placed on a stolen phone as alleged cramming. Instead such consumer complaints should be considered complaints over what was done with stolen property. Similarly, a complaint over charges placed on a lost phone is not cramming.
3. Billing questions: Customer questions over number of minutes of a call or call duration is not cramming.
4. Charges where the customer is unhappy with the service and wishes to cancel or if the customer contends he was misled about the product.

Staff's proposal makes a distinction between an "Inquiry" and a "Complaint." Staff will use the Commission's definition of a cramming complaint as "any written or oral communication from a person or entity that has been billed for a charge that the person or entity alleges was unauthorized and that was billed, either directly or indirectly, through a telephone company." Staff views consumer contact regarding general questions about a charge on their bill as an "inquiry" not reportable for cramming reporting purposes.

Staff proposes a monthly Cramming Complaint Report that contains the following information:

1. The total number of consumer cramming complaints received for that month that remain unresolved after 30 days;
2. The name, address, and telephone number of each entity that is the subject of cramming complaints;

3. The total number of subscribers billed (by working billing telephone number) by each entity for which cramming complaints were received;
4. The total number of cramming complaints, relative to each service provider, that remain unresolved from when the complaint was initially received, within the following time periods:
  - a. Between 30 and 60 days;
  - b. Between 60 and 90 days; and
  - c. Beyond 90 days.

These reports would be due by the last business day of the following month. Staff proposes to allow carriers 270 days to implement such a reporting scheme, counted from the date the Commission issues a final decision or resolution.

Staff also proposes a three-year record retention requirement. Every billing telephone company would be required to maintain for three years accurate and up-to-date records of all customer cramming complaints made to or received by it for charges for products or services provided by the billing telephone company, a third party or its affiliates. Every billing agent would be required to maintain accurate and up-to-date records of all customer cramming complaints regarding charges billed through a billing telephone company made to or received by it. In the case of billing telephone companies, the records would include information on all consumer cramming complaints involving entities that bill directly or indirectly on the billing telephone company's bill.

Staff would include specific opt-out provisions that would allow carriers to forego monthly reporting. On a monthly basis, a service provider may opt-out of the monthly reporting requirements by submitting a letter to the Director of CPSP stating that there are no reportable complaints for the subject month. Or the carrier could do so on an annual basis by submitting a letter to the Director of CPSP setting forth specific reasons as to why it should be exempted from the monthly reporting requirements for the entire subject year.

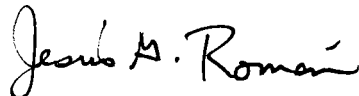
Verizon commends Staff on its hard and speedy work on this matter. There are several issues Staff should consider prior to issuing a final report.

First, it should try to avoid duplicative reporting of complaints. Staff's proposal that billing telephone companies (both wireline and wireless) and their billing agents including third-party vendors report cramming data to the Commission could lead to duplicative reporting of the same complaint. The requirements should clarify that one or the other should report as appropriate.

Second, the timing of the due date for the report is unclear. Staff states that the reports would be due the last business day of the following month, but does not state whether that means the month following the time the complaint is 30 days old, or simply the month following receipt of the complaint. If a complaint is received on day 28 (e.g., September 28, 2006) and remains unresolved 30 days later (or day 31, which in this example would be October 29th), do carriers have to report this complaint on the 30th or 31st (whichever is the last business day of the month, which in our example would be October 31st) or on the last business day of the next month (which in our example would be November 30)? If it is the former, then the due date is too ambitious because those complaints that are received towards the end of the month would age into the reporting category too close to the reporting date. In our example, the complaint would become reportable just one business day prior to the report due date. Given the amount of data requested, reporting these complaints would be too burdensome, and Verizon would recommend adjusting the reporting due date to 45 days following the end of the month in which the complaint is received. But if it is the latter (that is, on the last business day of the next month or November 30 in our example), then the date is acceptable.

Third, Staff does not specify when a cramming complaint is unresolved. There has been no discussion about what constitutes a resolved complaint versus an unresolved complaint. Obviously, if a carrier finds in favor of the customer and reverses the charge, the complaint is resolved. But what if the carrier sustains the charge? Is it resolved when the carrier finishes the investigation and attempts to inform the customer? Or is it resolved the day the carrier sends notice to the customer? Or is it when the customer agrees that the charge is authorized? Sometimes customer representatives must resort to mailing a letter because attempts to contact the customer are unsuccessful, those resolution of the complaint should be counted as of the date of mailing the notice. In any event, the requirements should clarify when resolution of a complaint occurs.

Respectfully submitted,



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JGR:jl

cc: Service List R.00-02-004 – Via E-mail and U.S. Mail  
Jessica Hecht – CPUC San Francisco, CA – Via E-mail

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

**Proceeding: R0002004 - PUC - OIR TO ESTABLISH**

**Filer: CPUC**

**List Name: LIST**

**Last changed: August 31, 2006**

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